



12/17/2014

Genevieve Damico *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: Custom Pultrusions Inc
Facility ID: 1667020035
Permit Type: Minor Permit Modification
Permit Number: P0117924

Dear Ms. Damico:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-2835 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

Erica R. Engel-Ishida, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Akron Regional Air Quality Management District



PROPOSED

**Division of Air Pollution Control
Title V Permit
for
Custom Pultrusions Inc**

Facility ID:	1667020035
Permit Number:	P0117924
Permit Type:	Minor Permit Modification
Issued:	12/17/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Custom Pultrusions Inc

Table of Contents

Authorization	1
A. Standard Terms and Conditions	2
1. Federally Enforceable Standard Terms and Conditions	3
2. Monitoring and Related Record Keeping and Reporting Requirements.....	3
3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance.....	6
4. Risk Management Plans	7
5. Title IV Provisions	7
6. Severability Clause	7
7. General Requirements	7
8. Fees.....	8
9. Marketable Permit Programs.....	8
10. Reasonably Anticipated Operating Scenarios	9
11. Reopening for Cause	9
12. Federal and State Enforceability	9
13. Compliance Requirements	9
14. Permit Shield	11
15. Operational Flexibility.....	11
16. Emergencies.....	12
17. Off-Permit Changes	12
18. Compliance Method Requirements	12
19. Insignificant Activities or Emissions Levels.....	13
20. Permit to Install Requirement.....	13
21. Air Pollution Nuisance	13
22. Permanent Shutdown of an Emissions Unit	13
23. Title VI Provisions	13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only	14
25. Records Retention Requirements Under State Law Only.....	14
26. Inspections and Information Requests	14
27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements.....	15
28. Permit Transfers	15



29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	15
30. Submitting Documents Required by this Permit	16
B. Facility-Wide Terms and Conditions.....	17
C. Emissions Unit Terms and Conditions	26
1. P919, General Fab. Machs.	27
2. Emissions Unit Group -Mixers: P929, P930, P931,	32
3. Emissions Unit Group - Pultrusion Lines: P901, P904, P905, P907, P908, P909, P910, P911, P912, P913, P914, P915, P922, P923, P924, P925, P926, P932, P933, P934, P935,	39



Proposed Title V Permit
Custom Pultrusions Inc
Permit Number: P0117924
Facility ID: 1667020035

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1667020035
Facility Description: Fiberglass Manufacturing Site
Application Number(s): A0051792
Permit Number: P0117924
Permit Description: Title V Minor Permit Modification to incorporate the requirements for emissions units P932 and P933 from PTI P0112462 into the Title V permit and to incorporate insignificant emissions unit P003 into the federal side of the Title V permit and to incorporate the requirements for emissions units P934 and P935 from PTI P0117197 into the Title V permit. This permit consists of 21 pultrusion lines, four resin batch mixers and general fabrication machines for the production of pultruded composite profiles.
Permit Type: Minor Permit Modification
Issue Date: 12/17/2014
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0117395

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Custom PultrusionsInc
1333 S. Chillicothe Rd.
Aurora, OH 44202-9220

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Akron Regional Air Quality Management District. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Proposed Title V Permit
Custom Pultrusions Inc
Permit Number: P0117924
Facility ID: 1667020035
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))



- c) The permittee shall submit required reports in the following manner:
- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the



probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Akron Regional Air Quality Management District. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Akron Regional Air Quality Management District by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of



federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Akron Regional Air Quality Management District unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))



4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.



- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))



10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible



Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Akron Regional Air Quality Management District concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Akron Regional Air Quality Management District) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.



- b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Akron Regional Air Quality Management District with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Akron Regional Air Quality Management District as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))



16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)



19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:



- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the Akron Regional Air Quality Management District.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Akron Regional Air Quality Management District. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention Requirements Under State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine



whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Akron Regional Air Quality Management District in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Akron Regional Air Quality Management District must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.



Proposed Title V Permit
Custom Pultrusions Inc
Permit Number: P0117924
Facility ID: 1667020035

Effective Date: To be entered upon final issuance

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Akron Regional Air Quality Management District, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



Proposed Title V Permit
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B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

a) None.

2. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-31, and/or 40 CFR Part 60 or 63:

- B001 4.5 million Btu/hour natural gas fired heater - Hastings PltHtr
- L004 Tooling Cold Cleaner with S-3680 solvent - New Tooling Cold Cleaner
- P002 General Laboratory; Quality Assurance & Research & Development – Laboratory
- P003 500 gallon polystyrene mixing tank - Mix Room Polystyrene Storage Tank
- T004 3,500 gallon resin/styrene storage tank - Tank 1 (previously designated as T001, PTI# 16-980)
- T005 3,500 gallon resin/styrene storage tank - Tank 2 (previously designated as T001, PTI# 16-980)
- T006 5,000 gallon resin/styrene storage tank - Tank 3 (previously designated as T001, PTI# 16-980)
- T007 5,000 gallon resin/styrene storage tank - Tank 4 (previously designated as T001, PTI# 16-980)

[Authority for term: OAC rule 3745-77-07(A)(13)]

3. The emissions of volatile organic compounds (VOC), organic compounds (OC) and styrene from emissions units P901, P904, P905, P907, P908, P909, P910, P911, P912, P913, P914, P915, P919, P922, P923, P924, P925, P926, P929, P930, P931, P932, P933, P934, P935, T003, T004, T005, T006 and T007, combined, shall not exceed 81.0 tons per year, 127.0 tons per year and 43.0 tons per year, respectively, based upon a rolling, 12-month summation of the monthly emission rates.

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(A)(1)]

4. In order to determine compliance with the VOC, OC and styrene emission limitations, the permittee shall maintain monthly records of the following information for emissions units P901, P904, P905, P907, P908, P909, P910, P911, P912, P913, P914, P915, P919, P922, P923, P924, P925, P926, P929, P930, P931, P932, P933, P934, P935, T003, T004, T005, T006 and T007, combined:

a) The permittee shall record the following information on a monthly basis for emissions units P901, P904, P905, P907, P908, P909, P910, P911, P912, P913, P914, P915, P922, P923, P924, P925, P926, P932, P933, P934 and P935, combined:

- (1) identification and quantity (pounds) of each resin received for processing;
- (2) styrene content (% by weight) of each resin;
- (3) VOC emissions from each resin, in pounds (i.e., $(\% \text{ styrene}/100) \times (\text{resin weight}) \times (0.07^*) \times (1-(CE^{**}/100))$);
- (4) OC emissions from each resin, in pounds (i.e., $(\% \text{ styrene}/100) \times (\text{resin weight}) \times (0.07^*) \times (1-(CE^{**}/100))$);



- (5) styrene emissions from each resin, in pounds (i.e., $(\% \text{ styrene}/100) \times (\text{resin weight}) \times (0.07^*) \times (1-(CE^{**}/100))$);
- (6) the VOC emission rate from all resins employed, in pounds (i.e., the sum of the VOC emissions from the resins in 4.a)(3) above);
- (7) the OC emission rate from all resins employed, in pounds (i.e., the sum of the OC emissions from the resins in 4.a)(4) above);
- (8) the styrene emission rate from all resins employed, in pounds (i.e., the sum of the styrene emissions from the resins in 4.a)(5) above);
- (9) identification and net usage^{***} of each cleanup material^{****} employed, in pounds;
- (10) the VOC content of each cleanup material, in weight percent;
- (11) the OC content of each cleanup material, in weight percent;
- (12) the VOC emission rate from all cleanup materials employed, in pounds (i.e., the sum of 4.a)(9) times [4.a)(10) divided by 100] for each cleanup material employed);
- (13) the OC emission rate from all cleanup materials employed, in pounds (i.e., the sum of 4.a)(9) times [4.a)(11) divided by 100] for each cleanup material employed);
- (14) the VOC emission rate for all resins and cleanup materials employed, in pounds (i.e., 4.a)(6) plus 4.a)(12)); and
- (15) the OC emission rate for all resins and cleanup materials employed, in pounds (i.e., 4.a)(7) plus 4.a)(13)).

These calculations shall be based upon a mass balance approach.

*Emission factor is from AP-42, Table 4.4-2 dated 2/07.

**CE is the emission reduction in weight percent. Wet area enclosures reduce emissions by sixty percent and direct die injection and pre-form injection reduce emissions by ninety percent.

***Net usage shall be the difference between quantities received and any returned for disposal/recycling, excluding solids.

****Activities involving cleanup material include the removal of composite materials, such as cured and uncured resin from equipment, finished surfaces, floors, hands of employees, or any other surfaces, including wipe cleaning of pultruded parts.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05]

- b) The permittee shall record the following information on a monthly basis for emissions unit P919:
 - (1) identification and net usage* of each cleanup material employed, in pounds;
 - (2) the VOC content of each cleanup material, in weight percent;



Effective Date: To be entered upon final issuance

- (3) the OC content of each cleanup material, in weight percent;
- (4) the VOC emission rate from all cleanup materials employed, in pounds (i.e., the sum of 4.b)(1) times [4.b)(2) divided by 100] for each cleanup material employed); and
- (5) the OC emission rate from all cleanup materials employed, in pounds (i.e., the sum of 4.b)(1) times [4.b)(3) divided by 100] for each cleanup material employed).

*Net usage shall be the difference between quantities received and any returned for disposal/recycling, excluding solids.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05]

- c) The permittee shall record the following information on a monthly basis for emissions units P929, P930 and P931, combined:
- (1) the total throughput of solvent (i.e., styrene), in pounds;
 - (2) the VOC emission rate from the mixing operations, in pounds (i.e., 4.c)(1) times 0.02*);
 - (3) the OC emission rate from the mixing operations, in pounds (i.e., 4.c)(1) times 0.02*);
 - (4) the styrene emission rate from the mixing operations, in pounds (i.e., 4.c)(1) times 0.02*);
 - (5) identification and net usage** of each cleanup material employed, in pounds;
 - (6) the VOC content of each cleanup material, in weight percent;
 - (7) the OC content of each cleanup material, in weight percent;
 - (8) the VOC emission rate from all cleanup materials employed, in pounds (i.e., the sum of 4.c)(5) times [4.c)(6) divided by 100] for each cleanup material employed);
 - (9) the OC emission rate from all cleanup materials employed, in pounds (i.e., the sum of 4.c)(5) times [4.c)(7) divided by 100] for each cleanup material employed);
 - (10) the VOC emission rate from the mixing operations and all cleanup materials employed, in pounds (i.e., 4.c)(2) plus 4.c)(8)); and
 - (11) the OC emission rate from the mixing operations and all cleanup materials employed, in pounds (i.e., 4.c)(3) plus 4.c)(9)).

*AP-42 Chapter 6.4.1 dated 5/83 states 1 or 2 percent of solvent is lost.

*Net usage shall be the difference between quantities received and any returned for disposal/recycling, excluding solids.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05]



- d) The permittee shall record the following information on a monthly basis for emissions units P901, P904, P905, P907, P908, P909, P910, P911, P912, P913, P914, P915, P919, P922, P923, P924, P925, P926, P929, P930, P931, P932, P933, P934, P935, T003, T004, T005, T006 and T007, combined:
- (1) the VOC emissions, tons per month (i.e., [4.a)(14) plus 4.b)(4) plus 4.c)(10)] divided by 2000 plus [X*/12]);
 - (2) the OC emissions, tons per month (i.e., [4.a)(15) plus 4.b)(5) plus 4.c)(11)] divided by 2000 plus [Y**/12]);
 - (3) the styrene emissions, tons per month (i.e., [4.a)(8) plus 4.c)(4)] divided by 2000 plus [Z***/12]);
 - (4) the rolling, 12-month summation of the monthly emissions of VOC, OC and styrene.

*"X" is the potential to emit of VOC for emissions units T003, T004, T005, T006 and T007, combined, in tons per year.

**"Y" is the potential to emit of OC for emissions units T003, T004, T005, T006 and T007, combined, in tons per year.

***"Z" is the potential to emit of styrene for emissions units T003, T004, T005, T006 and T007, combined, in tons per year.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05]

5. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a) all exceedances of the rolling, 12-month emission limitation for VOC;
 - b) all exceedances of the rolling, 12-month emission limitation for OC, and
 - c) all exceedances of the rolling, 12-month emission limitation for styrene.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05]

6. Compliance with the emission limitations in 3. above shall be determined in accordance with the following methods:
- a) Emission Limitations:

The emissions of VOC, OC and styrene from emissions units P901, P904, P905, P907, P908, P909, P910, P911, P912, P913, P914, P915, P919, P922, P923, P924, P925, P926, P929, P930, P931, P932, P933, P934, P935, T003, T004, T005, T006 and T007, combined, shall not exceed 81.0 tons per year, 127.0 tons per year and 43.0 tons per year, respectively, based upon a rolling, 12-month summation of the monthly emission rates.



Applicable Compliance Method:

Compliance with the annual allowable VOC, OC and styrene emission limitations above shall be demonstrated based on the record keeping requirements established in 4.a) through 4.d) above.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05]

7. The following emissions units are subject to 40 CFR Part 63, Subpart WWWW: L004, P003, P901, P904, P905, P907, P908, P909, P910, P911, P912, P913, P914, P915, P922, P923, P924, P925, P926, P929, P930, P931, P932, P933, P934, P935, T004, T005, T006 and T007. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website: <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District or local air agency.

8. The permittee shall comply with the applicable emission limitations and work practice standards required under 40 CFR Part 63, Subpart WWWW, including the following sections and Tables:

Section/Table: Requirement:

63.5805(b) All operations must meet the organic hazardous air pollutant (HAP) emissions limits in Table 3 of 40 CFR Part 63, Subpart WWWW and the work practice standards in Table 4 of 40 CFR Part 63, Subpart WWWW that apply, regardless of the quantity of HAP emitted.

Table 3 Organic HAP emission limit for pultrusion operations.

Table 4 Work practice standards for cleaning operations, HAP-containing materials storage operations and mixing operations.

63.5835(a) You must be in compliance at all times with the work practices in Table 4 of 40 CFR Part 63, Subpart WWWW, as well as the organic HAP emissions limits in Table 3 of 40 CFR Part 63, Subpart WWWW.

9. The permittee shall comply with one or more of the applicable options listed below for meeting the standards for pultrusion operations subject to the 60 weight percent organic HAP emissions reductions requirement required under 40 CFR Part 63, Subpart WWWW:

Section: Requirement:

63.5830(a) Achieve an overall reduction in organic HAP by employing a control device

63.5830(b) Design, install, and operate wet area enclosures and resin drip collection systems on pultrusion machines to meet the criteria specified in paragraphs (b)(1) through (10) of this section.

63.5830(c) Use of direct die injection pultrusion machines with resin drip collection systems that meet all the criteria specified in paragraphs (c)(1) through (3) of this section.

63.5830(d) Use of a perform injection system that meets the definition in §63.5935.



63.5830(e) Use of any combination of control options in (a) through (d) of this section in which different pultrusion lines comply with different options described in paragraphs (a) through (d) of this section and the weighted average reduction based on resin throughput of all machines combined is 60 percent. For purposes of the average percent reduction calculation, wet area enclosures reduce organic HAP emissions by 60 percent, and direct die injection and preform injection reduce organic HAP emissions by 90 percent.

10. The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart WWWW, including the following sections:

Section: Requirement:

63.5797 How to determine the organic HAP content of the resins and gel coats.

63.5895(c) Records that you must collect and keep for resin and gel coats.

63.5895(e) Record all times that wet area enclosures doors or covers are open and there is resin present in the resin bath.

63.5915(a)(1) You must keep a copy of each notification and report that you submitted to comply with this subpart.

63.5915(c) You must keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Tables 3, 5, and 7 of 40 CFR Part 63, Subpart WWWW.

63.5915(d) You must keep a certified statement that you are in compliance with the work practice requirements in Table 4 of 40 CFR Part 63, Subpart WWWW, as applicable.

63.5920(a) You must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to §63.10(b)(1).

63.5920(b) You must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

63.5920(c) You must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. You can keep the records offsite for the remaining 3 years.

63.5920(d) You may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.



11. The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart WWWW, including the following sections and Tables:

<u>Section/Table:</u>	<u>Requirement:</u>
63.5905(a)	You must submit all of the notification in Table 13 of 40 CFR Part 63, Subpart WWWW that apply to you by the dates specified in Table 13 of 40 CFR Part 63, Subpart WWWW.
63.5905(b)	If you change any information submitted in any notification, you must submit the changes in writing to the Administrator within 15 calendar days after the change.
Table 13	Applicability and Timing of Notifications.
63.5910(a)	You must submit each report in Table 14 of 40 CFR Part 63, Subpart WWWW that applies to you.
Table 14	Requirements for Reports.
63.5910(b)	You must submit each report by the date specified in Table 14 of 40 CFR Part 63, Subpart WWWW and according to paragraphs (b)(1) through (5) of this section.
63.5910(c)	Compliance reports must contain the information in paragraphs (c)(1) through (6) this section.
63.5910(d)	For each deviation from an organic HAP emissions limitation and for each deviation from the requirements for work practice standards that occurs at an affected source, the compliance report must contain the information in paragraphs (c)(1) through (4) of this section and in paragraphs (d)(1) and (2) of this section. This includes periods of startup, shutdown, and malfunction.
63.5910(g)	Each affect source that has obtained a Title V operating permit must report all deviations as defined by 40 CFR Part 63, Subpart WWWW in the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A).
63.5910(i)	Where multiple compliance options are available, you must state in your next compliance report if you have changed compliance options since your last compliance report.

12. The permittee shall demonstrate initial and continuous compliance with 40 CFR Part 63, Subpart WWWW as described in the following sections:

<u>Section/Table:</u>	<u>Requirement:</u>
63.5860(a)	Demonstrate initial compliance with the organic HAP emission standard by using procedures shown in Table 8 and 9 of 40 CFR Part 63, Subpart WWWW.
Table 8	Initial Compliance with Organic HAP Emissions Limits.
Table 9	Initial Compliance with Work Practice Standards.



- 63.5900(a)(2) Compliance with the organic HAP emission limit is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emission limit listed in Table 3 of 40 CFR Part 63, Subpart WWWW, on a 12-month rolling average.
- 63.5900(a)(4) Compliance with the work practice standards in Table 4 of 40 CFR Part 63, Subpart WWWW is demonstrated by performing the work practice required for your operation.
- 63.5900(b) You must report each deviation from each standard in §63.5805 that applies to you. The deviations must be reported according to the requirements in §63.5910.
- 63.5900(c) During periods of startup, shutdown or malfunction, you must meet the organic HAP emission limits and work practice standards that apply to you.



Proposed Title V Permit
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Permit Number: P0117924
Facility ID: 1667020035
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P919, General Fab. Machs.

Operations, Property and/or Equipment Description:

General Fabrication Machines

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	20.0 pounds of total organic materials*/** per day 0.2 pound of particulate emissions (PE) per hour See c)(1) below. *As defined under OAC rule 3745-21-01. **Includes cleanup material emissions. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Non-Attainment New Source Review)	See 3, 4, 4.a) through 4.d), 5 and 6 of Section B. Facility-Wide Terms and Conditions.
c.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
d.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



- (2) Additional Terms and Conditions
 - a. None.
- c) Operational Restrictions
 - (1) The PE from the emissions unit listed above shall be vented to either a baghouse or a dust extractor unit when the emissions unit is in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall record the following information on a daily basis for this emissions unit:
 - a. identification and net usage* of each cleanup material employed, in pounds;
 - b. the OC content of each cleanup material, in weight percent;
 - c. the OC emission rate from all cleanup materials employed, in pounds (i.e., the sum of d)(1)a. times [d)(1)b. divided by 100] for each cleanup material employed);

*Net usage shall be the difference between quantities received and any returned for disposal/recycling, excluding solids.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
 - (2) The permittee shall document when the baghouse or the dust extractor unit was not in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]
 - (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from each stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the stack identification;
 - b. the color of the emissions;
 - c. whether the emissions are representative of normal operations;
 - d. if the emissions are not representative of normal operations, the cause of the abnormal emissions;



- e. the total duration of any visible emissions incident; and
- f. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (e) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. Each day during which the total organic material emissions exceeded 20.0 pounds per day, and the actual organic material emissions for each such day.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the baghouse or the dust extractor unit servicing the emissions unit was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit quarterly written reports that identify:
 - a. all days during which any visible PE were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible PE.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]



- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:
- 20.0 pounds of total organic materials per day
- Applicable Compliance Method:
- Compliance with the daily allowable total organic materials emission limitation above shall be demonstrated based on the record keeping requirements established in d)(1) above. Formulation data shall be used to determine the total organic material content of each cleanup material employed.
- [Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
- b. Emission Limitation:
- 0.2 pound of PE per hour
- Applicable Compliance Method:
- If required, compliance with the hourly allowable PE limitation above shall be demonstrated by emission tests performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.
- [Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
- c. Emission Limitation:
- Visible PE from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- Applicable Compliance Method:
- If required, compliance with the allowable visible PE limitation above shall be demonstrated by visible PE observations performed in accordance with the method and procedures specified in OAC rule 3745-17-03(B)(1).
- [Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1)].



Proposed Title V Permit
Custom Pultrusions Inc
Permit Number: P0117924
Facility ID: 1667020035

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



2. Emissions Unit Group -Mixers: P929, P930, P931,

EU ID	Operations, Property and/or Equipment Description
P929	Process resin batch mixer - Resin Mix Station #1 (previously designated as P916)
P930	Process resin batch mixer - Resin Mix Station #2 (previously designated as P916)
P931	Special process resin batch mixer - Resin Mix Station #3 (previously designated as P916)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	For emissions units P929, P930 and P931: 3.32 pounds of organic compounds (OC) per hour for each emissions unit, from mixing* *Does not include emissions from cleanup material. See b)(2)a. below. 0.2 pound of particulate emissions (PE) per hour for emissions units P929, P930 and P931, combined See c)(5) below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-25 and 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Non-Attainment New Source Review)	See 3, 4, 4.a) through 4.d), 5 and 6 of Section B. Facility-Wide Terms and Conditions.
c.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-21-25	The permittee shall comply with the following terms and conditions: c)(1) through c)(4), d)(1), d)(2), d)(3), e)(1), e)(2), e)(3), e)(4) and e)(5) below.
g.	40 CFR Part 63, Subpart WWWW	See 7 through 12 of Section B. Facility-Wide Terms and Conditions.
h.	40 CFR Part 63, Subpart A (40 CFR Part 63.5925)	Table 15 to Subpart WWWW of Part 63 - Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63 shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The hourly OC emission limitations were established to reflect the potentials to emit for these emissions units. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these short term emission limitations.

c) Operational Restrictions

(1) The permittee shall use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1.0 inch are permissible around mixer shafts and any required instrumentation.

[Authority for term: Table 1 of OAC rule 3745-21-25 and OAC rule 3745-77-07(A)(1)]

(2) The permittee shall close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety.

[Authority for term: Table 1 of OAC rule 3745-21-25 and OAC rule 3745-77-07(A)(1)]

(3) The permittee shall keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

[Authority for term: Table 1 of OAC rule 3745-21-25 and OAC rule 3745-77-07(A)(1)]



- (4) The permittee shall not use cleaning solvents (cleaners) that have a volatile organic compound (VOC) content greater than 0.42 pound VOC per gallon, except cleaners used in closed systems and used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.

[Authority for term: Table 1 of OAC rule 3745-21-25 and OAC rule 3745-77-07(A)(1)]

- (5) The PE from the emissions units listed above shall be vented to the baghouse when one or more of the emissions units are in operation.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3)]

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall keep a copy of each applicability notification and compliance status report submitted to comply with OAC rule 3745-21-25, including all documentation supporting any applicability or compliance status.

[Authority for term: OAC rule 3745-21-25(P)(1)(a) and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall keep a certified statement that operations are in compliance with the work practice standards specified in c)(1) through c)(4) above.

[Authority for term: OAC rule 3745-21-25(P)(1)(e) and OAC rule 3745-77-07(C)(1)]

- (3) All records specified in d)(1) and d)(2) above shall be retained by the permittee for a period of not less than five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record and shall be made available to the director or any authorized representative of the director for review during normal business hours.

[Authority for term: OAC rule 3745-21-25(P)(4) and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall document when the baghouse was not in service when the emissions unit(s) was/were in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall perform daily checks, when the emissions unit(s) is/are in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving these emissions units. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. identification of the emissions units which are vented to the stack;
- b. the color of the emissions;
- c. whether the emissions are representative of normal operations;



- d. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- e. the total duration of any visible emissions incident; and
- f. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (e) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit(s)). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit(s) continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The owner or operator of a facility that has reinforced plastic composites production operations subject to OAC rule 3745-21-25 shall submit semiannual compliance status reports containing the information specified in e)(2)a. to e)(2)f. below. The semiannual compliance status reports shall be submitted no later than thirty calendar days after the end of each six-month period to the appropriate Ohio environmental protection agency district office or local air agency. The first compliance report shall cover the period beginning on the compliance date that is specified in paragraph (R) of OAC rule 3745-21-25 and ending on June thirtieth or December thirty-first, whichever date is the first date following the end of the first calendar half after the compliance date that is specified in paragraph (R) of OAC rule 3745-21-25. Each subsequent compliance report shall cover the semiannual reporting period from January first through June thirtieth or the semiannual reporting period from July first through December thirty-first.

[Authority for term: OAC rule 3745-21-25(Q)(1) and OAC rule 3745-77-07(C)(1)]

- (2) The compliance report shall contain the information specified in e)(2)a. to e)(2)f. below.
 - a. Company name and address.
 - b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
 - c. Date of the report and beginning and ending dates of the reporting period.
 - d. If there are no deviations from any VOC emissions limitations and operating limits that apply and there are no deviations from the work practice standards in table 1 of OAC rule 3745-21-25, a statement that there were no deviations from



VOC emissions limitations, operating limits, or work practice standards during the reporting period.

- e. For each deviation from a VOC emissions limitation or operating limit and for each deviation from a work practice standard that occurs at an affected operation where a CMS is not used to comply with the VOC emissions limitation, operating limit, or work practice standard in OAC rule 3745-21-25, the compliance report shall contain the information in e)(2)e.i. and e)(2)e.ii. below.
 - i. The total operating time of each affected operation during the reporting period.
 - ii. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
- f. Where multiple compliance options are available, the owner or operator shall state in this compliance report if the owner or operator has changed compliance options since the last compliance report.

[Authority for term: OAC rule 3745-21-25(Q)(3) and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall report if the facility exceeded the one hundred tons of VOC per year emissions threshold if that exceedance would make the facility subject to paragraph (D)(3) of OAC rule 3745-21-25.

[Authority for term: OAC rule 3745-21-25(Q)(4) and OAC rule 3745-77-07(C)(1)]

- (4) Each facility that has obtained a Title V permit pursuant to Chapter 3745-77 of the Administrative Code shall report all deviations as described in OAC rule 3745-21-25 in the semiannual monitoring report required by the Title V permit. If the facility submits a semiannual compliance report pursuant to OAC rule 3745-21-25 along with, or as part of, the semiannual monitoring report required by the facility's Title V permit, and the semiannual compliance report includes all required information concerning deviations from any VOC emissions limitation, operating limit, or work practice standard in OAC rule 3745-21-25, submission of the semiannual compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the appropriate Ohio environmental protection agency district office or local air agency.

[Authority for term: OAC rule 3745-21-25(Q)(5) and OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the baghouse servicing these emissions units was not in service when the emissions unit(s) was/were in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]



- (6) The permittee shall submit quarterly written reports that identify:
- a. all days during which any visible PE were observed from the stack serving these emissions units; and
 - b. any corrective actions taken to minimize or eliminate the visible PE.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

For emissions units P929, P930 and P931: 3.32 pounds of OC per hour for each emissions unit from mixing

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the maximum hourly solvent usage, in pounds of solvent per hour, by 0.02*

If required, compliance shall be demonstrated by emission tests performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 18, 25 or 25A, as appropriate.

*AP-42 Chapter 6.4.1 dated 5/83 states 1 or 2 percent of solvent is lost.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

- b. Emission Limitation:

0.2 pound of PE per hour for emissions units P929, P930 and P931, combined

Applicable Compliance Method:

If required, compliance with the hourly allowable PE limitation above shall be demonstrated by emission tests performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]



Proposed Title V Permit
Custom Pultrusions Inc
Permit Number: P0117924
Facility ID: 1667020035

Effective Date: To be entered upon final issuance

c. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance with the allowable visible PE limitation above shall be demonstrated by visible PE observations performed in accordance with the method and procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(1)]

g) Miscellaneous Requirements

(1) None.



3. Emissions Unit Group - Pultrusion Lines: P901, P904, P905, P907, P908, P909, P910, P911, P912, P913, P914, P915, P922, P923, P924, P925, P926, P932, P933, P934, P935,

EU ID	Operations, Property and/or Equipment Description
P901	Pultrusion Process Production Unit - Production Line 1
P904	Pultrusion Process Production Unit - Production Line 4
P905	Pultrusion Process Production Unit - Production Line 5
P907	Pultrusion Process Production Unit - Production Line 7
P908	Pultrusion Process Production Unit - Production Line 8
P909	Pultrusion Process Production Unit - Production Line 9
P910	Pultrusion Process Production Unit - Production Line 10
P911	Pultrusion Process Production Unit - Production Line 11, Cavity 1
P912	Pultrusion Process Production Unit - Production Line 11, Cavity 2
P913	Pultrusion Process Production Unit - Production Line 11, Cavity 3
P914	Pultrusion Process Production Unit - Production Line 13
P915	Pultrusion Process Production Unit - Production Line 12, Cavity 1
P922	Pultrusion Process Production Unit - Production Line 12, Cavity 2
P923	Pultrusion Process Production Unit - Production Line 14, Cavity 1
P924	Pultrusion Process Production Unit - Production Line 14, Cavity 2
P925	Pultrusion Process Production Unit - Production Line 14, Cavity 3
P926	Pultrusion Process Production Unit - Production Line 14, Cavity 4
P932	Pultrusion Process Production Unit - Production Line 15
P933	Pultrusion Process Production Unit - Production Line 16
P934	Pultrusion Process Production Unit - Production Line 2
P935	Pultrusion Process Production Unit - Production Line 3

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) and ORC 3704.03(T)	For emissions unit P932, P933, P934 and P095, the emission limitation specified by this rule is equivalent to the emission limitation established pursuant to 40 CFR Part 63, Subpart WWWW.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	For emissions units P934 and P935, the particulate emissions (PE) from each



Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		emissions unit shall not exceed 0.88 ton per year, based upon a rolling, 12-month summation of the monthly emission rates. See b)(2)c. below.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	For emissions units P932 and P933, the PE from each emissions unit shall not exceed 0.2 pound per hour and 0.88 ton per year. See b)(2)c. and b)(2)f. below.
d.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	For emissions units P932, P933, P934 and P935, see b)(2)d. below.
e.	OAC rule 3745-31-05(A)(3)	For emissions units P901, P904, P905, P907-P915 and P922-P926: 4.42 pounds of organic compounds (OC) per hour, from the pultrusion process* for each emissions unit. *Does not include emissions from cleanup material. For emissions units P901, P904, P905, P907-P915 and P922-P926: 0.2 pound of PE per hour for each emissions unit. See b)(2)e. below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-25, and 3745-31-05(D).
f.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Non-Attainment New Source Review)	See 3, 4, 4.a) through 4.d), 5 and 6 of Section B. Facility-Wide Terms and Conditions.
g.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
h.	OAC rule 3745-17-11(B)	For emissions units P932, P933, P934 and P935, the PE from each emissions unit shall not exceed 1.28 pounds per hour. This emission limitation applies after the Ohio's State Implementation Plan (SIP) is approved as noted below in b)(2)d. removing the Best Available Technology



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		(BAT) limitations. For emissions units P901, P904, P905, P907-P915 and P922-P926, the emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
i.	OAC rule 3745-21-25	Reduce total volatile organic compound (VOC) emissions by at least sixty per cent by weight. The permittee shall comply with the following terms and conditions: b)(2)a., b)(2)b., d)(1), d)(2), d)(3), d)(4), d)(5), d)(6), d)(7), e)(1), e)(2), e)(3), e)(4), e)(5), f)(1)d. and f)(2) below. Upon achieving compliance with this rule, the reinforced plastic composites production operations at the facility are not required to meet OAC rule 3745-21-07.
j.	40 CFR Part 63, Subpart WWWW	See 7 through 12 of Section B. Facility-Wide Terms and Conditions.
k.	40 CFR Part 63, Subpart A (40 CFR Part 63.5925)	Table 15 to Subpart WWWW of Part 63 - Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63 shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. For pultrusion operations, the permittee shall use one or more of the options in b)(2)a.i. to b)(2)a.v. below to meet the sixty weight per cent VOC emission limit in table 2 of OAC rule 3745-21-25:
 - i. Achieve an overall reduction in VOC emissions of sixty per cent by weight capturing the VOC emissions and venting them to a control device or any combination of control devices. Conduct capture and destruction efficiency testing as specified in 40 CFR 63.5850 to determine the per cent VOC emissions reduction.
 - ii. Design, install, and operate wet area enclosures and resin drip collection systems on pultrusion machines that meet the criteria in b)(2)a.ii.(a) to b)(2)a.ii.(j) below.



- (a) The enclosure shall cover and enclose the open resin bath and the forming area in which reinforcements are pre-wet or wet-out and moving toward the die(s). The surfaces of the enclosure shall be closed except for openings to allow material to enter and exit the enclosure.
- (b) For open bath pultrusion machines with a radio frequency pre-heat unit, the enclosure shall extend from the beginning of the resin bath to within 12.5 inches or less of the entrance of the radio frequency pre-heat unit. If the stock that is within 12.5 inches or less of the entrance to the radio frequency pre-heat unit has any drip, it shall be enclosed. The stock exiting the radio frequency pre-heat unit is not required to be in an enclosure if the stock has no drip between the exit of the radio frequency pre-heat unit to within 0.5 inches of the entrance of the die
- (c) For open bath pultrusion machines without a radio frequency pre-heat unit, the enclosure shall extend from the beginning of the resin bath to within 0.5 inches or less of the die entrance.
- (d) For pultrusion lines with pre-wet area(s) prior to direct die injection, no more than 12.5 inches of open wet stock is permitted between the entrance of the first pre-wet area and the entrance to the die. If the pre-wet stock has any drip, it shall be enclosed.
- (e) The total open area of the enclosure shall not exceed two times the cross sectional area of the puller window(s) and shall comply with the requirements in b)(2)a.ii.(e)(i) to b)(2)a.ii.(e)(iii) below.
 - (i) All areas that are open need to be included in the total open area calculation with the exception of access panels, doors, and/or hatches that are part of the enclosure.
 - (ii) The area that is displaced by entering reinforcement or exiting product is considered open.
 - (iii) Areas that are covered by brush covers are considered closed.
- (f) Open areas for level control devices, monitoring devices, agitation shafts, and fill hoses shall have no more than 1.0 inch clearance.
- (g) The access panels, doors, and/or hatches that are part of the enclosure shall close tightly. Damaged access panels, doors, and/or hatches that do not close tightly shall be replaced.
- (h) The enclosure may not be removed from the pultrusion line, and access panels, doors, and/or hatches that are part of the enclosure shall remain closed whenever resin is in the bath, except for the time period discussed in b)(2)a.ii.(i) below.



- (i) The maximum length of time the enclosure may be removed from the pultrusion line or the access panels, doors and/or hatches and may be open, is thirty minutes per eight-hour shift, forty-five minutes per twelve-hour shift or ninety minutes per day if the machine is operated for twenty-four hours in a day. The time restrictions do not apply if the open doors or panels do not cause the limit of two times the puller window area to be exceeded. Facilities may average the times that access panels, doors and/or hatches are open across all operating lines. In that case the average shall not exceed the times shown in this paragraph. All lines included in the average shall have operated the entire time period being averaged.
- (j) No fans, blowers and/or air lines may be allowed within the enclosure. The enclosure shall not be ventilated.
- iii. Use direct die injection pultrusion machines with resin drip collection systems that meet all the criteria specified in b)(2)a.iii.(a) to b)(2)a.iii.(c) below.
 - (a) All the resin that is applied to the reinforcement is delivered directly to the die.
 - (b) No exposed resin is present, except at the face of the die.
 - (c) Resin drip is captured in a closed system and recycled back to the process.
- iv. Use a pre-form injection system that meets the definition in paragraph (GG)(60) of rule 3745-21-01 of the Administrative Code.
- v. Use any combination of options in b)(2)a.i. to b)(2)a.iv. above in which different pultrusion lines comply with different options described in b)(2)a.i. to b)(2)a.iv. above; and
 - (a) Each individual pultrusion machine meets the sixty per cent reduction requirement; or
 - (b) The weighted average reduction based on resin throughput of all pultrusion machines combined is sixty per cent. For purposes of the average per cent reduction calculation, wet area enclosures reduce VOC emissions by sixty per cent, and direct die injection and pre-form injection reduce VOC emissions by ninety per cent. For averaging purposes, zero reduction credit is earned during production on lines that have not installed and operated enclosures or injection systems as described in b)(2)a.i. to b)(2)a.iv. above.



- b. The permittee shall not use cleaning solvents (cleaners) that have a VOC content greater than 0.42 pound VOC per gallon, except cleaners used in closed systems and used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
- c. The permittee has satisfied the BAT requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's SIP. Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE from the emissions units listed above since the uncontrolled potential to emit for PE is each less than 10 tons per year for each emissions unit.

- e. The hourly PE and OC emission limitations were established to reflect the potentials to emit for the emissions units listed above. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these emission limitations.
- f. The hourly and annual PE limitations were established to reflect the potential to emit for the emissions units listed above. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these emission limitations.

c) Operational Restrictions

- (1) The PE from the emissions units listed above shall be vented to either a baghouse or a dust extractor unit when one or more of the emissions units are in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) Procedures for determination of VOC emissions factors for reinforced plastic composites production operations and determination of monomer content of resins and gel coats.

- a. Emissions factors are used in OAC rule 3745-21-25 to determine compliance with certain VOC emissions limits in table 2 and table 3 of OAC rule 3745-21-25



and to calculate VOC emissions. A person may use the equations in table 1 to Subpart WWWW of 40 CFR 63 to calculate such emissions factors or may use any VOC emissions factor approved by USEPA, such as emission factors or emission factor equations from AP-42. These equations and emissions factors are intended to provide a method for one to demonstrate compliance without the need to conduct a VOC emissions test. In lieu of these equations and emissions factors, the permittee can elect to use site-specific VOC emissions factors to demonstrate compliance and to calculate VOC emissions provided the site specific VOC emissions factors are incorporated in the facility's air emissions permit and are based on actual facility VOC emissions test data using the test procedures in 40 CFR 63.5850 or paragraph (C) of rule 3745-21-10 of the Administrative Code. Stack test data for the facility shall supersede emission factors and other emission estimating techniques.

- b. In order to determine the monomer content of resins and gel coats, the permittee may rely on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified in d)(1)b.i. to d)(1)b.iii. below, as applicable.
 - i. Include in the total monomer content each monomer compound that is present at 0.1 per cent by mass or more for OSHA-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4) and at 1.0 per cent by mass or more for other monomer compounds.
 - ii. If the monomer content is provided by the material supplier or manufacturer as a range, the permittee shall use the upper limit of the range for determining compliance. If a separate measurement of the total monomer content, such as an analysis of the material by USEPA method 311 of appendix A to 40 CFR Part 63, exceeds the upper limit of the range of the total monomer content provided by the material supplier or manufacturer, then the permittee shall use the measured monomer content to determine compliance.
 - iii. If the monomer content is provided as a single value, the permittee may use that value to determine compliance. If a separate measurement of the total monomer content is made and is less than two percentage points higher than the value for total monomer content provided by the material supplier or manufacturer, then the permittee still may use the provided value to demonstrate compliance. If the measured total monomer content exceeds the provided value by two percentage points or more, then the permittee shall use the measured total monomer content to determine compliance.

[Authority for term: OAC rule 3745-21-25(E) and OAC rule 3745-77-07(C)(1)]

- (2) For meeting any VOC emission limitations based on a VOC emission limitation specified in table 2 or table 3 of OAC rule 3745-21-25, the permittee shall collect and keep records of resin and gel coat use, monomer content, and operation where the resin is used. Resin use records may be based on purchase records if the permittee can reasonably



estimate how the resin is applied. The monomer content records may be based on MSDS or on resin specifications supplied by the resin supplier.

[Authority for term: OAC rule 3745-21-25(O)(2)(b) and OAC rule 3745-77-07(C)(1)]

- (3) For each pultrusion machine, the permittee shall record all times that doors or covers of wet area enclosures are open and there is resin present in the resin bath.

[Authority for term: OAC rule 3745-21-25(O)(2)(d) and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall keep a copy of each applicability notification and compliance status report submitted to comply with OAC rule 3745-21-25, including all documentation supporting any applicability or compliance status.

[Authority for term: 3745-21-25(P)(1)(a) and OAC rule 3745-77-07(C)(1)]

- (5) For operations listed in tables 2, 3 and 4 of OAC rule 3745-21-25, the permittee shall keep all data, assumptions, and calculation used to determine monomer contents and VOC emissions factors.

[Authority for term: OAC rule 3745-21-25(P)(1)(c) and OAC rule 3745-77-07(C)(1)]

- (6) The permittee shall keep a certified statement that operations are in compliance with the work practice standards specified in b)(2)b. above.

[Authority for term: OAC rule 3745-21-25(P)(1)(e) and OAC rule 3745-77-07(C)(1)]

- (7) All records specified in d)(4), d)(5) and d)(6) above shall be retained by the permittee for a period of not less than five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record and shall be made available to the director or any authorized representative of the director for review during normal business hours.

[Authority for term: OAC rule 3745-21-25(P)(4) and OAC rule 3745-77-07(C)(1)]

- (8) The permittee shall document when the baghouse or the dust extractor unit was not in service when the emissions unit(s) was/were in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (9) The permittee shall perform daily checks, when the emissions unit(s) is/are in operation and when the weather conditions allow, for any visible PE from each stack serving these emissions units. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the stack identification;
- b. identification of the emissions units which are vented to the stack;
- c. the color of the emissions;



- d. whether the emissions are representative of normal operations;
- e. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- f. the total duration of any visible emissions incident; and
- g. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (f) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit(s)). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit(s) continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The owner or operator of a facility that has reinforced plastic composites production operations subject to OAC rule 3745-21-25 shall submit semiannual compliance status reports containing the information specified in e)(3)a. to e)(3)f. below. The semiannual compliance status reports shall be submitted no later than thirty calendar days after the end of each six-month period to the appropriate Ohio environmental protection agency district office or local air agency. Each compliance report shall cover the semiannual reporting period from January first through June thirtieth or the semiannual reporting period from July first through December thirty-first.

[Authority for term: OAC rule 3745-21-25(Q)(1) and OAC rule 3745-77-07(C)(1)]

- (2) For each facility that is subject to permitting requirements pursuant to Chapter 3745-77 of the Administrative Code (pertaining to Title V permits), the permittee may submit the first and subsequent semiannual compliance reports according to the dates established within the facility's Title V permit, instead of according to the dates specified in e)(1) above.
- (3) The compliance report shall contain the information specified in e)(3)a. to e)(3)f. below.
 - a. Company name and address.
 - b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy and completeness of the content of the report.
 - c. Date of the report and beginning and ending dates of the reporting period.



- d. If there are no deviations from any VOC emissions limitations and operating limits that apply and there are no deviations from the work practice standards in table 1 of OAC rule 3745-21-25, a statement that there were no deviations from VOC emissions limitations, operating limits or work practice standards during the reporting period.
- e. For each deviation from a VOC emissions limitation or operating limit and for each deviation from a work practice standard that occurs, the compliance report shall contain the information in e)(3)e.i. and e)(3)e.ii. below.
 - i. The total operating time of each affected operation during the reporting period.
 - ii. Information on the number, duration and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
- f. Where multiple compliance options are available, the owner or operator shall state in this compliance report if the owner or operator has changed compliance options since the last compliance report.

[Authority for term: OAC rule 3745-21-25(Q)(3) and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall report if the facility exceeded the one hundred tons of VOC per year emissions threshold if that exceedance would make the facility subject to paragraph (D)(3) of OAC rule 3745-21-25.

[Authority for term: OAC rule 3745-21-25(Q)(4) and OAC rule 3745-77-07(C)(1)]

- (5) Each facility that has obtained a Title V permit pursuant to Chapter 3745-77 of the Administrative Code shall report all deviations as described in OAC rule 3745-21-25 in the semiannual monitoring report required by the Title V permit. If the facility submits a semiannual compliance report pursuant to OAC rule 3745-21-25 along with, or as part of, the semiannual monitoring report required by the facility's Title V permit, and the semiannual compliance report includes all required information concerning deviations from any VOC emissions limitation, operating limit, or work practice standard in OAC rule 3745-21-25, submission of the semiannual compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the appropriate Ohio environmental protection agency district office or local air agency.

[Authority for term: OAC rule 3745-21-25(Q)(5) and OAC rule 3745-77-07(C)(1)]

- (6) For emissions units P934 and P935, the permittee shall notify the appropriate Ohio environmental protection agency district office or local air agency in writing that such operation is subject to OAC rule 3745-21-25. The notification, which shall be submitted not later than the date of initial startup of the affected operations, shall provide the following information:



- a. Name and address of the owner or operator;
- b. Address (i.e., physical location) of the facility;
- c. Equipment description and Ohio EPA application number (if assigned) of the affected operation;
- d. Identification of the applicable requirements, the means of compliance and the compliance date for the affected operation under OAC rule 3745-21-25; and
- e. Regarding a permit for the affected operation, whichever of the following is applicable:
 - i. Submission of an application for an operating permit, a permit modification or an operating permit renewal in accordance with rule 3745-31-02 of the Administrative Code; or
 - ii. Submission of a statement of intent to submit an application for a Title V permit or modification of a Title V permit in accordance with rule 3745-77-02 or 3745-77-06 of the Administrative Code, respectively.

[Authority for term: OAC rule 3745-21-25(S)(1) and OAC rule 3745-77-07(C)(1)]

- (7) The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the baghouse or dust extraction unit servicing these emissions units was not in service when the emissions unit(s) was/were in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (8) The permittee shall submit quarterly written reports that identify:
 - a. all days during which any visible PE were observed from the stack(s) serving these emissions units; and
 - b. any corrective actions taken to minimize or eliminate the visible PE.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



a. Emission Limitations:

For emissions units P901, P904, P905, P907-P915 and P922-P926: 0.2 pound of PE per hour for each emissions unit.

For emissions units P932 and P933, the PE from each emissions unit shall not exceed 0.2 pound per hour.

Applicable Compliance Method:

If required, compliance with the hourly allowable PE limitations above shall be demonstrated by emission tests performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

b. Emission Limitation:

For emissions units P932 and P933, the PE from each emissions unit shall not exceed 0.88 ton per year.

Applicable Compliance Method:

Compliance with the annual allowable PE limitation above shall be demonstrated by multiplying the hourly allowable PE limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be demonstrated.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

c. Emission Limitation:

For emissions units P932, P933, P934 and P935, the PE from each emissions unit shall not exceed 1.28 pounds per hour.

Applicable Compliance Method:

If required, compliance with the hourly allowable PE limitation above shall be demonstrated by emission tests performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

d. Emission Limitation:

For emissions units P934 and P935, the PE from each emissions unit shall not exceed 0.88 ton per year, based upon a rolling, 12-month summation of the monthly emission rates.



Applicable Compliance Method:

The annual allowable PE limitation above was established by multiplying the maximum hourly PE (0.2 pound per hour) by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the maximum hourly PE (0.2 pound per hour) is maintained, compliance with the annual allowable emission limitation shall be demonstrated.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

e. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance with the allowable visible PE limitation above shall be demonstrated by visible PE observations performed in accordance with the method and procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(1)]

f. Emission Limitation:

Reduce total VOC emissions by at least sixty per cent by weight

Applicable Compliance Method:

Compliance with the allowable total VOC emission limitation above shall be demonstrated by maintaining a VOC emission factor value less than or equal to the appropriate VOC emissions limit listed in table 2 or table 3 of OAC rule 3745-21-25, on a twelve-month rolling average and shall be demonstrated based on the record keeping requirements established in d)(1), d)(2), d)(3) and d)(5) above.

g. Emission Limitation:

For emissions units P901, P904, P905, P907-P915 and P922-P926: 4.42 pounds of OC per hour, from the pultrusion process for each emissions unit.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the maximum pounds of styrene per hour by 0.07*.



Proposed Title V Permit
Custom Pultrusions Inc
Permit Number: P0117924
Facility ID: 1667020035

Effective Date: To be entered upon final issuance

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

*Emission factor is from AP-42, Table 4.4-2 dated 2/07.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

- (2) Compliance with the work practice standards in table 1 of OAC rule 3745-21-25 is demonstrated by performing the work practice required for the affected operation.

[Authority for term: OAC rule 3745-21-25(O)(1)(a)(ii) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.